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Q And you are doing their medical research work?

A For twenty four years I have been either qualifying myself for such work or actually engaging in it.

Q Where have you been engaged in research work and what was the nature of the work you have been engaged in?

A For two years after graduating at the University of Virginia I did post graduate work at the University, then post graduate work, twelve months in Vienna and then in England.

Q Where? A. Pasteur Institute, Paris, Vienna University and Liverpool University in Liverpool, England.

Q Did you have any research work regarding the quantity of blood cast from a dead body or a living body?

A I have done analyses to determine the amount of blood and the identification of blood elements and have particularized in it.

Q Was any soil handed to you coming supposedly from the scene of this killing?

A. On October 2nd I received packages, boxes, paste board boxes were delivered to me at the laboratory at New Brunswick by Sergeant Spearman, and Mr. J. G. Van Arsdale.

Q Were you at that time doing all the research work for the Middlesex Prosecutor's office?

A I have done all the work for them.

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Q What was the soil? Will you describe what was given to you? A. This soil when received by us weighed 158 pounds.

I am permitted to read my notes?

COURT: If it is necessary.

A (Continuing.) 158 pounds, of which about four and a half pounds consisted of small stones, which were thoroughly scrubbed off and scalded and then about two pounds of partially dried blades of grass and roots which were included in my analysis. That was the basis of my analysis. In doing that we collected a quantity of soil in that section.

Q What vicinity do you refer to, Mr. Anderson?

A In the vicinity where the bodies were found.

Q Who collected that soil?

A Mr. Holloday, one of my chemists.

Q How much was collected and brought to you?

A I don't know the amount.

Q Now having gotten these soils as a basis for your analysis what did you do? A. We took the soil and to it we added a definite amount of human blood, allowed it to remain for a period of time and then we determined the amount of blood or blood elements we could recover from that soil, into which we had put a known amount of human blood. That was the basis of our method we used for the assay of the soil in question.

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Q Assuming that a woman's dead body was found on the soil handed to you, with her throat cut, did you determine whether the throat was cut before or after the woman was shot? A. In our opinion her throat was cut after she was shot.

Q After she was dead? A. After her heart had ceased to beat.

Q Tell us why you made that conclusion.

A Because if a person or an animal has their throat cut before the heart ceases to beat, which would occur by reason of a shot through the brain, they would bleed a very much larger quantity of blood than they would if the reverse was the case.

Q How much would they bleed?

A They would bleed the difference between about 70 percent and about a minimum of from 10 percent to a maximum of 40 percent.

Q What did you find in this case?

A We found in this case a quantity representing about eight tenths of a pint of blood in the amount of soil to be examined.

Q And if the throat was cut before the heart stopped beating you would find how much?

A Over six pints.

Q Did you make up your opinion assuming the woman's body was

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lying on the soil delivered to you, form any opinion as to whether the throat was cut there or elsewhere?

A In our opinion the throat was cut there.

Q You could not tell from your analyses whether they had been shot at that place or not?

A I could not.

CROSS EXAMINATION BY MR. PREIFFER:

Q I thought you said--the Senator asked you the question I think--are you able to tell, Dr. Anderson, from your examination of the portions of the soil given to you, approximately how long after Mrs. Mills was shot her throat had been cut?

A That is simply a question of opinion.

Q I understand. I am asking your opinion as a scientist. If the Senator has no objection.

MR. SIMPSON: No objection.

A Our opinion is that it could not have been a longer interval than a half hour.

M R S. G R A C E E D W A R D S duly sworn for
DIRECT EXAMINATION BY MR. SIMPSON:

Q MR. SIMPSON: Will you admit, Mr. Pfeiffer--
I don't want you to unless you think you can
do it--there was some talk yesterday about